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6 *Attorneys for Interpleader Plaintiff*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF ARIZONA**

9 Transamerica Life Insurance Company,

10 Interpleader Plaintiff,

11 v.

12 Tayjalaya S. Williams, Brittany A. Retzlaff,
13 Collin A. Retzlaff and Denise A. Hollas,

14 Interpleader Defendants.

No. 2:24-cv-00379-ROS

**INTERPLEADER PLAINTIFF'S
RESPONSE TO INTERPLEADER
DEFENDANT TAYJALAYA S.
WILLIAMS' MOTION FOR SUR-
REPLY**

15 Transamerica opposes Defendant Williams' Motion for a Sur-Reply.

16 "Sur-replies are highly disfavored and permitted only in extraordinary
17 circumstances." *Finley v. Maricopa Cnty. Sheriff's Office*, CV-14-02609-PHX-DLR, 2016
18 WL 777700, at *1, n.1 (D. Ariz. Feb. 29, 2016), *aff'd sub nom. Finley v. Fax*, 683 Fed.
19 App. 630 (9th Cir. 2017). Here, no extraordinary circumstances have arisen. Instead,
20 Williams' Motion for a Sur-Reply "raises no new arguments beyond those presented" in
21 her Response to Transamerica's Motion Requesting Dismissal. *Id.* It "merely reiterates
22 arguments made in her response brief ... [and] is neither appropriate nor helpful."¹ *Id.* To

23
24 ¹ Plaintiff's Motion includes cases that do not appear to exist. There appears to be no
25 District of Arizona case entitled *Ransom v. Penn Mutual Life Insurance Co.*, and the
26 reporter citation provided corresponds to an unrelated case, 43 F. Supp. 94 (S.D.N.Y.
27 1941). This same citation appears in Williams' Response to Transamerica's Motion for
28 Dismissal. (ECF No. 54). Similarly, there are incorrect citations to "*Sun Life Assurance
Co. of Canada v. Wood*", where the citation points instead to 529 F.2d 47 (4th Cir. 1975).
Finally, and contrary to Williams' assertion, *Prudential v. Hinkel* appears not to be an
Arizona case but instead yet another unrelated case at 121 F.3d 364 (8th Cir. 1997). These
citations suggest that Defendant Williams may be using AI, such as ChatGPT, to draft
arguments to attempt to prolong Transamerica's final dismissal from this matter.

1 the contrary, her repeated pleadings are increasing the cost and time for resolution of this
2 matter. Therefore, the Court should deny the Motion.

3 DATED this 29th day of August, 2024.

4 LEWIS ROCA ROTHGERBER CHRISTIE LLP

5 By: /s/Andrew Jacobsohn

6 Stephen M. Bressler

7 Andrew Jacobsohn

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8 Life Insurance Company

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